

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

FRIENDS OF GEORGE’S, INC.)

PLAINTIFF,)

v.)

Case No. 2:23-cv-02163-TLP-tmp

STEVEN J. MULROY, in his official and)
individual capacity as District Attorney)
General of Shelby County, TN,)

DEFENDANT.)

**JOINT DECLARATION OF BRICE M. TIMMONS, CRAIG A. EDGINGTON, AND
MELISSA J. STEWART IN SUPPORT OF PLAINTIFF’S APPLICATION FOR AN
AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES**

STATE OF TENNESSEE
COUNTY OF SHELBY

I, Brice M. Timmons, after being duly sworn, on oath state as follows:

1. I am an attorney licensed to practice law in the state of Tennessee and practice law at the law firm of Donati Law, PLLC, located at 1545 Union Ave., Memphis, Tennessee 38104.

2. With Craig Edgington, Melissa Stewart, Jacob Brown, and Sarah McKinney, I am counsel of record and was lead trial counsel to the Plaintiff in the above captioned matter.

3. I have been licensed to practice law since 2010, am an active member of the American Bar Association, Tennessee Bar Association and the Federal Bar Association, and am in good standing with the Tennessee Bar. Furthermore, I am admitted to the Western and Middle Districts of Tennessee, the Western and Eastern Districts of Arkansas, the Sixth Circuit Court of Appeals, the Tenth Circuit Court of Appeals, and all courts of the State of Tennessee.

4. I am the supervising attorney for Donati Law's civil rights practice group, which functions as an independent group within Donati Law. The group consists of myself, Mr. Edgington and Ms. Stewart. I am the supervising attorney and am responsible for overseeing the operation of the group.

5. Over 90% of our practice is devoted to federal civil rights litigation arising under 42 U.S.C. § 1983, the Americans with Disabilities Act, the Rehabilitation Act, Title IX of the Civil Rights Act, and the Trafficking Victims Protection Act. For the entirety of my career, I have been active counsel in federal civil rights cases or held an academic position teaching civil rights law. I have substantial experience litigating civil rights issues of public importance with such cases making up a significant portion of my practice for nearly a decade and being the near-exclusive focus of my practice for approximately half that time.

6. I supervised the creation of the contemporaneous billing records in this case and confirm that the figures listed in the Table on Page 2 of the Motion for Attorney Fees and Suit Expenses are correct as to myself, Craig A. Edgington, and Melissa Stewart. Billing details are attached to this declaration. I further certify that the amount of costs requested on Page 3 of the Motion are also correct. Immediately prior to the filing of this Motion, I conducted a review of the billing records of Mr. Edgington, Ms. Stewart and myself and affirm that the time expended was reasonable and necessary to the preparation of the case.

7. As the filing attorney for the Motion, I have reviewed the bills of all other attorneys involved in the suit. Those attorneys are responsible for providing their own support for the necessity and reasonableness of their fees. I do not claim familiarity with Washington, D.C. or New York, NY rates. I have provided examples of and citations to numerous levels of forum rates

for attorneys in Tennessee ranging from \$225 for associates to \$650 for experienced senior litigators.

8. In 2021 I was awarded \$420 per hour and Mr. Edgington \$275 per hour in a 42 U.S.C. § 1983 federal class action settlement under a Lodestar calculation with no multiplier applied in *Turnage v. Oldham*, 2021 U.S. Dist. LEXIS 239877 (W.D. Tenn. Dec 9, 2021) (Mays, J.).

9. In September 2022, I was awarded \$400 per hour and Mr. Edgington \$260 per hour in an ADA class action case under a Lodestar calculation with no multiplier applied in *G.S. et al, v. Governor Gill Bill Lee*, 2:21-cv-02552-SHL-atc (W.D. Tenn. 2022) where both my fees and time were contested. Judge Sheryl Lipman also only reduced our billed time by 1 hour. (ECF No. 140, PageID 1859, n. 8). This award was for work conducted in mid to late 2021.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of June, 2023 at Memphis, Tennessee

/s/Brice M. Timmons
Brice M. Timmons

Matter	Description	User	Billing Date	Hrs	Amount
Friends of George's v. State of Tennessee	Initial Contact with Vanessa Rodley; arranged for meeting with MJS and Ms. Rodley	Brice M Timmons	3/16/2023	0.4	\$180.00
Friends of George's v. State of Tennessee	Meeting with Vanessa Rodley and MJS	Brice M Timmons	3/16/2023	1.5	\$675.00
Friends of George's v. State of Tennessee	Preparation for meeting with Board of Friends of George's	Brice M Timmons	3/16/2023	4.8	\$2,160.00
Friends of George's v. State of Tennessee	Meeting with Board of Friends of George's	Brice M Timmons	3/17/2023	4.2	\$1,890.00
Friends of George's v. State of Tennessee	Team meeting to discuss new case	Brice M Timmons	3/16/2023	0.8	\$360.00
Friends of George's v. State of Tennessee	Legal research on the obscenity standard and Courts' interpretation of Miller.	Brice M Timmons	3/20/2023	6.8	\$3,060.00
Friends of George's v. State of Tennessee	Legal research on content-based restrictions and strict scrutiny in Courts across the U.S.	Brice M Timmons	3/21/2023	7.3	\$3,285.00
Friends of George's v. State of Tennessee	Legal research on overbreadth and the Chilling Effect	Brice M Timmons	3/22/2023	7.8	\$3,510.00
Friends of George's v. State of Tennessee	Research on the Jackson Pride event, Representative Chris Todd's actions, interviews regarding that event, TCA Sections 39-17-901, 7-51-1401, and 1407, TCA 39-17-901, and legislative history.	Brice M Timmons	3/23/2023	5.5	\$2,475.00
Friends of George's v. State of Tennessee	Afternoon meeting with MJS to discuss obscenity standard and Courts' interpretation of Miller. Receipt of her notes for further review later. Assigned her to focus on content-based restrictions following day.	Brice M Timmons	3/20/2023	1.4	\$630.00
Friends of George's v. State of Tennessee	Afternoon meeting with MJS to discuss content-based restrictions/strict scrutiny. Assigned her to focus on overbreadth and the chilling effect on 3/22.	Brice M Timmons	3/21/2023	0.8	\$360.00
Friends of George's v. State of Tennessee	Afternoon meeting with MJS about overbreadth and the Chilling Effect. Assigned her to conduct background investigation information and legislative history research on 3/23.	Brice M Timmons	3/22/2023	1.6	\$720.00
Friends of George's v. State of Tennessee	Afternoon meeting with MJS. Gave her assignment of putting together the first draft of the complaint and motion for TRO/preliminary injunction due by cob 3/24.	Brice M Timmons	3/23/2023	0.7	\$315.00
Friends of George's v. State of Tennessee	Receipt and review of MJS's first draft complaint. Provided edits/comments and sent back to her for review.	Brice M Timmons	3/24/2023	1.4	\$630.00
Friends of George's v. State of Tennessee	Received MJS's draft of Plaintiff's Motion for TRO/PI and made edits/returned.	Brice M Timmons	3/27/2023	1.8	\$810.00
Friends of George's v. State of Tennessee	Receipt of Plaintiff's First Amended Complaint and Motion for TRO/PI as to Bill Lee and Jonathan Skrmetti, and updated summons. Edited and sent to MJS for filing.	Brice M Timmons	3/28/2023	1.2	\$540.00
Friends of George's v. State of Tennessee	Attended video status conference with the Court which began at 5:30 p.m. Oral arguments scheduled for March 30.	Brice M Timmons	3/28/2023	1	\$450.00
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 13-19, specifically ECF 19, D's Resp. in Opposition.	Brice M Timmons	3/29/2023	1.5	\$675.00
Friends of George's v. State of Tennessee	Conducted legal research on standing.	Brice M Timmons	3/29/2023	4.6	\$2,070.00
Friends of George's v. State of Tennessee	Meeting with MJS to discuss standing arguments from response, assignment of reply prior to hearing on 3/30.	Brice M Timmons	3/29/2023	1.5	\$675.00
Friends of George's v. State of Tennessee	Reviewed P's Reply to D's Response to P's Motion for TRO. Made edits/comments and sent back to MJS.	Brice M Timmons	3/30/2023	3.2	\$1,440.00
Friends of George's v. State of Tennessee	Received/reviewed MJS's draft of Complaint of Friends of George's v. Mulroy and Motion for TRO/PI against Mulroy. Made edits/comments and sent back.	Brice M Timmons	3/29/2023	1.2	\$540.00
Friends of George's v. State of Tennessee	Preparation for TRO hearing. Travel to 201 Poplar to serve Steve Mulroy in advance of hearing. Brief conference with Jessica Indigaro.	Brice M Timmons	3/30/2023	7.1	\$3,195.00
Friends of George's v. State of Tennessee	Travel to and participation in TRO/PI initial hearing.	Brice M Timmons	3/30/2023	3.6	\$1,620.00
Friends of George's v. State of Tennessee	Receipt and review of Order Granting TRO. Conference with MJS and CAE re: same.	Brice M Timmons	3/31/2023	2.3	\$1,035.00
Friends of George's v. State of Tennessee	Preparation for and attendance of video teams' status conference with the Court.	Brice M Timmons	4/5/2023	1	\$450.00
Friends of George's v. State of Tennessee	Receipt and review of order extending temp restraining order and consolidating cases.	Brice M Timmons	4/6/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 33 - 33-3.	Brice M Timmons	4/10/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Reviewed MJS's Plaintiff's Initial Disclosures. Approved for transmittal.	Brice M Timmons	4/20/2023	0.4	\$180.00
Friends of George's v. State of Tennessee	Receipt and review of MJS's Pre-trial brief. Sent comments/edits back.	Brice M Timmons	4/13/2023	2.4	\$1,080.00
Friends of George's v. State of Tennessee	Receipt and review of Defendants' Motions to Dismiss	Brice M Timmons	4/18/2023	1	\$450.00
Friends of George's v. State of Tennessee	Meeting with team to discuss the Motion to Dismiss.	Brice M Timmons	4/18/2023	1	\$450.00

Friends of George's v. State of Tennessee	Receipt and review of MJS's P's Notices of Voluntary Dismissal of Defendants other than Steve Mulroy, along with Plaintiff's response to Defendants' Motion to Dismiss. Edited and approved for filing.	Brice M Timmons	4/19/2023	0.5	\$225.00
Friends of George's v. State of Tennessee	Receipt and review of the State of Tennessee's Motion to Intervene in FOG v. Mulroy.	Brice M Timmons	4/20/2023	0.2	\$90.00
Friends of George's v. State of Tennessee	Receipt and review of the Mulroy's Answer.	Brice M Timmons	4/20/2023	0.3	\$135.00
Friends of George's v. State of Tennessee	Receipt and review of the Mulroy's Answer.	Brice M Timmons	4/20/2023	0.3	\$135.00
Friends of George's v. State of Tennessee	Prepared for and attended Teams video conferencing with the Court.	Brice M Timmons	4/25/2023	0.6	\$270.00
Friends of George's v. State of Tennessee	Reviewed and approved Notice to Withdrawal in part of Previous Filing.	Brice M Timmons	4/25/2023	0.2	\$90.00
Friends of George's v. State of Tennessee	Receipt and review of Steve Mulroy's Trial Brief.	Brice M Timmons	4/28/2023	1.8	\$810.00
Friends of George's v. State of Tennessee	Receipt and review of Order Granting Motion to Dismiss.	Brice M Timmons	5/2/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Reviewed/commented on MJS's first draft of Plaintiff's Supplemental Response to Motion to Dismiss.	Brice M Timmons	5/4/2023	1.4	\$630.00
Friends of George's v. State of Tennessee	Receipt and review of MJS's 2nd draft with CAE's edits. Made final comments/edits.	Brice M Timmons	5/4/2023	0.8	\$360.00
Friends of George's v. State of Tennessee	Reviewed MJS's Appendix to P's Reply to D's Trial Brief. Conducted independent analysis of the 8 cases cited by Mulroy to ensure MJS was correct.	Brice M Timmons	5/4/2023	3.8	\$1,710.00
Friends of George's v. State of Tennessee	Travel to/from, and attendance of pre-trial conference.	Brice M Timmons	5/12/2023	1.2	\$540.00
Friends of George's v. State of Tennessee	Preparation for pre-trial conference.	Brice M Timmons	5/12/2023	1.4	\$630.00
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 64-65, Defendant's pleadings in support of MTD.	Brice M Timmons	5/12/2023	0.8	\$360.00
Friends of George's v. State of Tennessee	Receipt and review of ECF No 71, letter from concerned citizen.	Brice M Timmons	5/15/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Receipt and review of ECF No 72-76-15, letters from concerned citizens .	Brice M Timmons	5/19/2023	0.5	\$225.00
Friends of George's v. State of Tennessee	Receipt and review of ECF No 77-77-9, letters from concerned citizens.	Brice M Timmons	5/22/2023	0.4	\$180.00
Friends of George's v. State of Tennessee	Prepared for Bench Trial. Including, but not limited to mock trial and witness preparation.	Brice M Timmons	5/18/2023	8	\$3,600.00
Friends of George's v. State of Tennessee	Prepared for Bench Trial. Including, but not limited to mock trial and witness preparation.	Brice M Timmons	5/19/2023	8	\$3,600.00
Friends of George's v. State of Tennessee	Receipt and review of SDT from Jim Newsom.	Brice M Timmons	4/20/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom with copies of the legislature's hearing recordings transcripts.	Brice M Timmons	4/28/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Receipt and review of email with Proposed changes to the Joint Pretrial Order from D.A. Mulroy sent from Robert Wilson.	Brice M Timmons	5/5/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Reviewed Proposed changes to the Joint Pretrial Order from D.A. Mulroy sent from Robert Wilson. Accepted some changes and emailed back the disagreements.	Brice M Timmons	5/5/2023	0.2	\$90.00
Friends of George's v. State of Tennessee	Emailed robert back with addition of single witness to the May call list.	Brice M Timmons	5/5/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Receipt and review of Robert's objection and Defendants' further proposed changes to the Joint Pretrial Order.	Brice M Timmons	5/5/2023	0.2	\$90.00
Friends of George's v. State of Tennessee	Drafted and sent courtesy email with pleadings to Jim Newsom.	Brice M Timmons	3/27/2023	0.2	\$90.00
Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom regarding court reporter and transcription of legislative history.	Brice M Timmons	4/10/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Receipt and reiew of email from Megan Shaw about Actors' Equity wanting to file Amicus Brief.	Brice M Timmons	4/10/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Multiple emails with Megan Shaw and zoom meeting with MJS and Ms. Shaw.	Brice M Timmons	4/10/2023	1	\$450.00
Friends of George's v. State of Tennessee	Receipt and review of the Actors' Equity Association's Amicus Brief.	Brice M Timmons	4/17/2023	0.6	\$270.00
Friends of George's v. State of Tennessee	Received email exchange regarding combined initial and pre-trial disclosures and participated in a joint call in the afternoon.	Brice M Timmons	4/18/2023	0.6	\$270.00
Friends of George's v. State of Tennessee	Receipt and review of D's 30b6 notice of deposition via email.	Brice M Timmons	4/19/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Sent courtesy email to Jim Newsom regarding motion to intervene and the filing of our dismissal documents.	Brice M Timmons	4/19/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Receipt of email from Jim with new 30(b)(6) Notice, Roggs, RFPD, and RFA.	Brice M Timmons	4/20/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Preparation of Vanessa Rodley for her deposition on Monday.	Brice M Timmons	4/21/2023	1.5	\$675.00

Friends of George's v. State of Tennessee	Deposition of Vanessa Rodley.	Brice M Timmons	4/24/2023	3	\$1,350.00
Friends of George's v. State of Tennessee	Receipt of email from Jim Newsom regarding additional legislative transcripts that would be available later in the day that were found in self-audit.	Brice M Timmons	4/21/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Confirmation email sent to Jairo Mendez about status conference availability.	Brice M Timmons	4/25/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom about discovery production.	Brice M Timmons	5/2/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Travel to/attendance of preliminary injunction/bench trial.	Brice M Timmons	5/22/2023	8.6	\$3,870.00
Friends of George's v. State of Tennessee	Travel to/attendance of 2nd day of preliminary injunction/bench trial.	Brice M Timmons	5/23/2023	3.6	\$1,620.00
Friends of George's v. State of Tennessee	Pre-trial preparation.	Brice M Timmons	5/22/2023	1.5	\$675.00
Friends of George's v. State of Tennessee	Post first day trial meeting/preparation for day 2.	Brice M Timmons	5/22/2023	1.2	\$540.00
Friends of George's v. State of Tennessee	Receipt and review of Judge Parker's Findings of Fact and Conclusions of Law.	Brice M Timmons	6/2/2023	1.4	\$630.00
Friends of George's v. State of Tennessee	Receipt and review of Judgment.	Brice M Timmons	6/7/2023	0.1	\$45.00
Friends of George's v. State of Tennessee	Zoom call with Abby Rubenfeld	Brice M Timmons	3/18/2023	0.8	\$360.00
Friends of George's v. State of Tennessee	Emailed Melissa Stewart regarding legal research	Brice M Timmons	3/22/2023	0.3	\$135.00
Friends of George's v. State of Tennessee	Communicate with McLaren and Gilbert regarding attorney fee affidavits. Gather and compile exhibits for attorney fee application. Final review of all Donati Law billing for accuracy and completeness. Draft attorney fee motion.	Brice M Timmons	6/21/2023	4.5	\$2,025.00
		Hourly Rate = \$450	Totals	140.9	\$63,405.00

Matter	Description	User	Billing Date	Hrs	Amount
Friends of George's v. State of Tennessee	Team meeting to discuss new case	Craig A Edgington	3/16/2023	0.8	\$220.00
Friends of George's v. State of Tennessee	Receipt and review of MJS's first draft complaint. Provided edits/comments and sent back to her for review.	Craig A Edgington	3/25/2023	1.2	\$330.00
Friends of George's v. State of Tennessee	Received MJS's draft of Plaintiff's Motion for TRO/PI and made edits/returned.	Craig A Edgington	3/27/2023	1.2	\$330.00
Friends of George's v. State of Tennessee	Receipt and review of NOA for myself and MJS. Edited and informed her to file both with the modifications.	Craig A Edgington	3/28/2023	0.3	\$82.50
Friends of George's v. State of Tennessee	Receipt of Plaintiff's First Amended Complaint and Motion for TRO/PI as to Bill Lee and Jonathan Skrmetti, and updated summons. Provided formatting suggestions/comments to MJS.	Craig A Edgington	3/28/2023	0.5	\$137.50
Friends of George's v. State of Tennessee	Attended video status conference with the Court which began at 5:30 p.m. Oral arguments scheduled for March 30.	Craig A Edgington	3/28/2023	1	\$275.00
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 13-19, specifically ECF 19, D's Resp. in Opposition.	Craig A Edgington	3/29/2023	1.2	\$330.00
Friends of George's v. State of Tennessee	Reviewed P's Reply to D's Response to P's Motion for TRO. Made edits/comments and sent back to MJS.	Craig A Edgington	3/30/2023	0.6	\$165.00
Friends of George's v. State of Tennessee	Received/reviewed MJS's draft of Complaint of Friends of George's v. Mulroy and Motion for TRO/PI against Mulroy. Made edits/comments and sent back.	Craig A Edgington	3/29/2023	0.8	\$220.00
Friends of George's v. State of Tennessee	Preparation for TRO hearing.	Craig A Edgington	3/30/2023	0.8	\$220.00
Friends of George's v. State of Tennessee	Travel to and participation in TRO/PI initial hearing.	Craig A Edgington	3/30/2023	3.6	\$990.00
Friends of George's v. State of Tennessee	Receipt and review of Order Granting TRO. Conference with MJS and BMT.	Craig A Edgington	3/31/2023	1.8	\$495.00
Friends of George's v. State of Tennessee	Preparation for and attendance of video teams' status conference with the Court.	Craig A Edgington	4/5/2023	1	\$275.00
Friends of George's v. State of Tennessee	Receipt and review of order extending temp restraining order and consolidating cases.	Craig A Edgington	4/6/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 33 - 33-3.	Craig A Edgington	4/10/2023	0.2	\$55.00
Friends of George's v. State of Tennessee	Reviewed MJS's Initial Disclosures.	Craig A Edgington	4/20/2023	0.3	\$82.50
Friends of George's v. State of Tennessee	Receipt and review of MJS's Pre-trial brief. Sent mostly formatting comments/edits back.	Craig A Edgington	4/13/2023	1.2	\$330.00
Friends of George's v. State of Tennessee	Receipt and review of Defendants' Motions to Dismiss	Craig A Edgington	4/18/2023	0.6	\$165.00
Friends of George's v. State of Tennessee	Meeting with team to discuss the Motion to Dismiss.	Craig A Edgington	4/18/2023	1	\$275.00
Friends of George's v. State of Tennessee	Receipt and review of the State of Tennessee's Motion to Intervene in FOG v. Mulroy.	Craig A Edgington	4/20/2023	0.2	\$55.00
Friends of George's v. State of Tennessee	Receipt and review of Steve Mulroy's Trial Brief.	Craig A Edgington	4/28/2023	0.8	\$220.00
Friends of George's v. State of Tennessee	Receipt and review of Order Granting Motion to Dismiss.	Craig A Edgington	5/2/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Reviewed MJS's Plaintiff's Supplemental Response to Motion to Dismiss, provided feedback.	Craig A Edgington	5/4/2023	1.2	\$330.00
Friends of George's v. State of Tennessee	Receipt and review of MJS's 2nd draft. Made final comments/edits.	Craig A Edgington	5/4/2023	0.5	\$137.50
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 64-65, Defendant's pleadings in support of MTD.	Craig A Edgington	5/12/2023	0.8	\$220.00
Friends of George's v. State of Tennessee	Receipt and review of ECF No 71, letter from concerned citizen.	Craig A Edgington	5/15/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt and review of ECF No 72-76-15, letters from concerned citizens.	Craig A Edgington	5/19/2023	0.4	\$110.00
Friends of George's v. State of Tennessee	Receipt and review of ECF No 77-77-9, letters from concerned citizens.	Craig A Edgington	5/22/2023	0.4	\$110.00
Friends of George's v. State of Tennessee	Receipt and review of SDT from Jim Newsom.	Craig A Edgington	4/20/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom with copies of the legislature's hearing recordings transcripts.	Craig A Edgington	4/28/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt and review of email with Proposed changes to the Joint Pretrial Order from D.A. Mulroy sent from Robert Wilson.	Craig A Edgington	5/5/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Email to JWW to calendar briefing deadlines following hearing.	Craig A Edgington	3/28/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom regarding court reporter and transcription of legislative history.	Craig A Edgington	4/10/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt and review of email from Megan Shaw about Actors' Equity wanting to file Amicus Brief.	Craig A Edgington	4/10/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt and review of the Actors' Equity Association's Amicus Brief.	Craig A Edgington	4/17/2023	0.6	\$165.00
Friends of George's v. State of Tennessee	Receipt and review of emails regarding pretrial order, initial disclosures, motion to stay discovery (or for protective order). Did not participate in the afternoon call regarding the same.	Craig A Edgington	4/18/2023	0.3	\$82.50
Friends of George's v. State of Tennessee	Receipt and review of D's 30b6 notice of deposition via email.	Craig A Edgington	4/19/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt of courtesy email to Jim Newsom regarding motion to intervene and the filing of our dismissal documents.	Craig A Edgington	4/19/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt of email from Jim with new 30(b)(6) Notice, Roggs, RFPD, and RFA.	Craig A Edgington	4/20/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt of email from Jim Newsom regarding additional legislative transcripts that would be available later in the day that were found in self-audit.	Craig A Edgington	4/21/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom about discovery production.	Craig A Edgington	5/2/2023	0.1	\$27.50

Friends of George's v. State of Tennessee	Receipt and review of Judge Parker's Findings of Fact and Conclusions of Law.	Craig A Edgington	6/2/2023	1.2	\$330.00
Friends of George's v. State of Tennessee	Receipt and review of Judgment.	Craig A Edgington	6/7/2023	0.1	\$27.50
Friends of George's v. State of Tennessee	Zoom call with MJS shortly after midnight regarding First Amended Complaint. Reviewed pleading, discussed filing without BMT approval.	Craig A Edgington	3/28/2023	1.8	\$495.00
		Hourly Rate = \$275	Totals	27.8	\$7,645.00

Matter	Description	User	Billing Date	Hrs	Amount
Friends of George's v. State of Tennessee	Meeting with Vanessa Rodley and BMT	Melissa Stewart	3/16/2023	1.5	\$375.00
Friends of George's v. State of Tennessee	Preparation for meeting with Board of Friends of George's on 3/17	Melissa Stewart	3/16/2023	2.4	\$600.00
Friends of George's v. State of Tennessee	Meeting with Board of Friends of George's	Melissa Stewart	3/17/2023	4.2	\$1,050.00
Friends of George's v. State of Tennessee	Team meeting to discuss new case	Melissa Stewart	3/16/2023	0.8	\$200.00
Friends of George's v. State of Tennessee	Legal research on the obscenity standard and Courts' interpretation of Miller. Drafted summary of findings/memo for BMT to review.	Melissa Stewart	3/20/2023	7.2	\$1,800.00
Friends of George's v. State of Tennessee	Legal research on content-based restrictions and strict scrutiny in Courts across the U.S.	Melissa Stewart	3/21/2023	6.8	\$1,700.00
Friends of George's v. State of Tennessee	Legal research on overbreadth and the Chilling Effect	Melissa Stewart	3/22/2023	6.8	\$1,700.00
Friends of George's v. State of Tennessee	Research on Jackson Pride event, Representative Chris Todd's actions, interviews regarding that event, TCA Section 7-51-1401 and 1407, TCA 39-17-901, and legislative history.	Melissa Stewart	3/23/2023	8	\$2,000.00
Friends of George's v. State of Tennessee	Post research daily meeting with BMT to discuss legal research on the obscenity standard and Courts' interpretation of Miller.	Melissa Stewart	3/20/2023	1.4	\$350.00
Friends of George's v. State of Tennessee	Afternoon meeting with BMT to discuss content-based restrictions/strict scrutiny. Received assignment to focus on overbreadth and the chilling effect next day.	Melissa Stewart	3/21/2023	0.8	\$200.00
Friends of George's v. State of Tennessee	Afternoon meeting with BMT about overbreadth and the Chilling Effect. Assigned to conduct background investigation information and legislative history research tomorrow.	Melissa Stewart	3/22/2023	1.6	\$400.00
Friends of George's v. State of Tennessee	Afternoon meeting with BMT about legislative history information. Assigned to put together the first draft of the complaint and motion for TRO/preliminary injunction by end of tomorrow.	Melissa Stewart	3/23/2023	0.7	\$175.00
Friends of George's v. State of Tennessee	Drafted first draft of Complaint. Provided to BMT and CAE for review.	Melissa Stewart	3/24/2023	11.2	\$2,800.00
Friends of George's v. State of Tennessee	Began drafting Plaintiff's Motion for TRO/PI.	Melissa Stewart	3/25/2023	9.4	\$2,350.00
Friends of George's v. State of Tennessee	Continued drafting Plaintiff's Motion for TRO/PI.	Melissa Stewart	3/26/2023	8.6	\$2,150.00
Friends of George's v. State of Tennessee	Finalized draft of Plaintiff's Motion for TRO/PI and sent to BMT and CAE for review.	Melissa Stewart	3/27/2023	2.4	\$600.00
Friends of George's v. State of Tennessee	Receipt and review of BMT and CAE's edits/comments to both the Complaint and motion for TRO/PI. Finalized pleadings and reviewed in great detail. Drafted Summons, Cover Sheet, and filed all pleadings under BMT's signature.	Melissa Stewart	3/27/2023	4.5	\$1,125.00
Friends of George's v. State of Tennessee	Drafted NOA for myself and CAE. Sent to CAE for review/approval. Finalized and filed.	Melissa Stewart	3/28/2023	0.6	\$150.00
Friends of George's v. State of Tennessee	Drafted Plaintiff's First Amended Complaint and Motion for TRO/PI as to Bill Lee and Jonathan Skrmetti, and updated summons. Sent to BMT/CAE for review/approval.	Melissa Stewart	3/28/2023	2.2	\$550.00
Friends of George's v. State of Tennessee	Attended video status conference with the Court which began at 5:30 p.m. Oral arguments scheduled for March 30.	Melissa Stewart	3/28/2023	1	\$250.00
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 13-19, specifically ECF 19, D's Resp. in Opposition.	Melissa Stewart	3/29/2023	1.2	\$300.00
Friends of George's v. State of Tennessee	Conducted legal research on standing.	Melissa Stewart	3/29/2023	6.8	\$1,700.00
Friends of George's v. State of Tennessee	Meeting with BMT to discuss standing arguments from response, assignment of reply prior to hearing on 3/30.	Melissa Stewart	3/29/2023	1.5	\$375.00
Friends of George's v. State of Tennessee	Drafted Complaint of Friends of George's v. Mulroy and Motion for TRO/PI against Mulroy. Sent to BMT/CAE for review.	Melissa Stewart	3/29/2023	3.2	\$800.00
Friends of George's v. State of Tennessee	Drafted P's Reply to D's Response to P's Motion for TRO. Cited to the filing of Friends of George's v. Mulroy in the reply and the Motion for Consolidation. Sent to BMT/CAE for review.	Melissa Stewart	3/29/2023	5.2	\$1,300.00
Friends of George's v. State of Tennessee	Receipt of BMT/CAE edits/comments. Finalized Complaint/Motion/Summons/Cover Sheet against Mulroy and filed shortly after midnight.	Melissa Stewart	3/30/2023	2.8	\$700.00
Friends of George's v. State of Tennessee	Drafted Declarations for myself, Mystie, and Vanessa. Reviewed with clients and had them execute.	Melissa Stewart	3/29/2023	1.8	\$450.00
Friends of George's v. State of Tennessee	After discussion with BMT, drafted amended declarations of myself, Mystie, and Vanessa. Filed Amended Notice of Declarations with the Court.	Melissa Stewart	3/30/2023	1.4	\$350.00
Friends of George's v. State of Tennessee	Preparation for TRO hearing.	Melissa Stewart	3/30/2023	5.5	\$1,375.00
Friends of George's v. State of Tennessee	Travel to and participation in TRO/PI initial hearing.	Melissa Stewart	3/30/2023	3.6	\$900.00
Friends of George's v. State of Tennessee	Receipt and review of Order Granting TRO. Conference with BMT/CAE regarding next steps.	Melissa Stewart	3/31/2023	2.5	\$625.00
Friends of George's v. State of Tennessee	Preparation for and attendance of video teams' status conference with the Court.	Melissa Stewart	4/5/2023	1	\$250.00
Friends of George's v. State of Tennessee	Receipt and review of order extending temp restraining order and consolidating cases.	Melissa Stewart	4/6/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 33 - 33-3.	Melissa Stewart	4/10/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Drafted Plaintiff's Initial Disclosures. Sent to BMT/CAE for edits/review.	Melissa Stewart	4/20/2023	1.2	\$300.00
Friends of George's v. State of Tennessee	Began draft of FoG's Pre-trial brief.	Melissa Stewart	4/12/2023	10.8	\$2,700.00
Friends of George's v. State of Tennessee	Continued drafting FoG's Pre-trial brief. Sent to BMT/CAE for review.	Melissa Stewart	4/13/2023	7.5	\$1,875.00
Friends of George's v. State of Tennessee	Receipt and review of BMT/CAE's edits/comments. Continued drafting and put Trial Brief into final format and filed with the Court.	Melissa Stewart	4/14/2023	5.4	\$1,350.00
Friends of George's v. State of Tennessee	Receipt and review of Defendants' Motions to Dismiss	Melissa Stewart	4/18/2023	0.8	\$200.00

Friends of George's v. State of Tennessee	Meeting with team to discuss the Motion to Dismiss.	Melissa Stewart	4/18/2023	1	\$250.00
Friends of George's v. State of Tennessee	Draft P's Notices of Voluntary Dismissal of Defendants other than Steve Mulroy, along with Plaintiff's response to Defendants' Motion to Dismiss. Send to BMT/CAE for review.	Melissa Stewart	4/18/2023	1.4	\$350.00
Friends of George's v. State of Tennessee	Filed P's Notices of Voluntary Dismissal of Defendants other than Steve Mulroy, along with Plaintiff's response to Defendants' Motion to Dismiss.	Melissa Stewart	4/19/2023	0.4	\$100.00
Friends of George's v. State of Tennessee	Receipt and review of the State of Tennessee's Motion to Intervene in FOG v. Mulroy.	Melissa Stewart	4/20/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Receipt and review of the Mulroy's Answer.	Melissa Stewart	4/20/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Prepared for and attended Teams video conferencing with the Court.	Melissa Stewart	4/25/2023	0.6	\$150.00
Friends of George's v. State of Tennessee	Drafted Notice to Withdrawal in part of Previous Filing and sent to BMT/CAE for review.	Melissa Stewart	4/25/2023	0.6	\$150.00
Friends of George's v. State of Tennessee	Filed Notice to Withdrawal in part of Previous Filing.	Melissa Stewart	4/25/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Receipt and review of Steve Mulroy's Trial Brief.	Melissa Stewart	4/28/2023	2.2	\$550.00
Friends of George's v. State of Tennessee	Receipt and review of Order Granting Motion to Dismiss.	Melissa Stewart	5/2/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Began drafting Plaintiff's Supplemental Response to Motion to Dismiss.	Melissa Stewart	5/4/2023	6.4	\$1,600.00
Friends of George's v. State of Tennessee	Receipt and review of BMT/CAE's edits/comments. Drafted my second draft of Plaintiff's Supplemental Response to Motion to Dismiss and transmitted for final approval.	Melissa Stewart	5/4/2023	2.4	\$600.00
Friends of George's v. State of Tennessee	Began drafting Appendix to P's Reply to D's Trial Brief which provided analysis of 8 cases cited by Mulroy.	Melissa Stewart	5/3/2023	4.2	\$1,050.00
Friends of George's v. State of Tennessee	Finished drafting Appendix to P's Reply to D's Trial Brief which provided analysis of 8 cases cited by Mulroy.	Melissa Stewart	5/4/2023	5.3	\$1,325.00
Friends of George's v. State of Tennessee	Finalized and filed Appendix to P's reply to D's Trial Brief.	Melissa Stewart	5/5/2023	0.6	\$150.00
Friends of George's v. State of Tennessee	Travel to/from, and attendance of pre-trial conference.	Melissa Stewart	5/12/2023	1.2	\$300.00
Friends of George's v. State of Tennessee	Preparation for pre-trial conference.	Melissa Stewart	5/12/2023	2.2	\$550.00
Friends of George's v. State of Tennessee	Receipt and review of ECF Nos. 64-65, Defendant's pleadings in support of MTD.	Melissa Stewart	5/12/2023	1	\$250.00
Friends of George's v. State of Tennessee	Receipt and review of ECF No 71, letter from concerned citizen.	Melissa Stewart	5/15/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of ECF No 72-76-15, letters from concerned citizens .	Melissa Stewart	5/19/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Receipt and review of ECF No 77-77-9, letters from concerned citizens.	Melissa Stewart	5/22/2023	0.4	\$100.00
Friends of George's v. State of Tennessee	Prepared for Bench Trial. Including, but not limited to mock trial and witness preparation.	Melissa Stewart	5/18/2023	8	\$2,000.00
Friends of George's v. State of Tennessee	Prepared for Bench Trial. Including, but not limited to mock trial and witness preparation.	Melissa Stewart	5/19/2023	8	\$2,000.00
Friends of George's v. State of Tennessee	Receipt and review of SDT from Jim Newsom.	Melissa Stewart	4/20/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom with copies of the legislature's hearing recordings transcripts.	Melissa Stewart	4/28/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of email with Proposed changes to the Joint Pretrial Order from D.A. Mulroy sent from Robert Wilson.	Melissa Stewart	5/5/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of Defendant's First Roggs, RFPs, and RFA. Ensured due dates on computer. Scheduled time to meet with clients to answer.	Melissa Stewart	4/20/2023	0.6	\$150.00
Friends of George's v. State of Tennessee	Drafted and transmitted Plaintiff's First Requests for Admission to D.A. Mulroy.	Melissa Stewart	4/14/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Drafted and transmitted Plaintiff's First Requests to Defendant Bill Lee.	Melissa Stewart	4/14/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Drafted and transmitted email to Jim Newsom with the amended complaint.	Melissa Stewart	3/28/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom regarding court reporter and transcription of legislative history.	Melissa Stewart	4/10/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of email from Megan Shaw about Actors' Equity wanting to file Amicus Brief.	Melissa Stewart	4/10/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of multiple emails between Megan Shaw and BMT. Ended in zoom meeting with me, BMT, and Ms. Shaw.	Melissa Stewart	4/10/2023	1	\$250.00
Friends of George's v. State of Tennessee	Emailled courtesy copy of the trial brief to D.A. Mulroy as he had not made an appearance in the matter yet.	Melissa Stewart	4/14/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt and review of the Actors' Equity Association's Amicus Brief.	Melissa Stewart	4/17/2023	0.6	\$150.00
Friends of George's v. State of Tennessee	Consulted with Jim Newsom via email regarding combined initial and pre-trial disclosures and participated in a joint call in the afternoon.	Melissa Stewart	4/18/2023	0.6	\$150.00
Friends of George's v. State of Tennessee	Receipt and review of D's 30b6 notice of deposition via email.	Melissa Stewart	4/19/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt of courtesy email to Jim Newsom regarding motion to intervene and the filing of our dismissal documents.	Melissa Stewart	4/19/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Receipt of email from Jim with new 30(b)(6) Notice, Roggs, RFPD, and RFA.	Melissa Stewart	4/20/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Preparation of Vanessa Rodley for her deposition on Monday.	Melissa Stewart	4/21/2023	1.5	\$375.00
Friends of George's v. State of Tennessee	Deposition of Vanessa Rodley.	Melissa Stewart	4/24/2023	3	\$750.00
Friends of George's v. State of Tennessee	Receipt of email from Jim Newsom regarding additional legislative transcripts that would be available later in the day that were found in self-audit.	Melissa Stewart	4/21/2023	0.1	\$25.00

Friends of George's v. State of Tennessee	Receipt and review of email from Jim Newsom about discovery production.	Melissa Stewart	5/2/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Travel to/attendance of preliminary injunction/bench trial.	Melissa Stewart	5/22/2023	8.6	\$2,150.00
Friends of George's v. State of Tennessee	Travel to/attendance of 2nd day of preliminary injunction/bench trial.	Melissa Stewart	5/23/2023	3.6	\$900.00
Friends of George's v. State of Tennessee	Pre-trial preparation.	Melissa Stewart	5/22/2023	1.4	\$350.00
Friends of George's v. State of Tennessee	Post first day trial meeting/preparation for day 2.	Melissa Stewart	5/22/2023	1.2	\$300.00
Friends of George's v. State of Tennessee	Receipt and review of Judge Parker's Findings of Fact and Conclusions of Law.	Melissa Stewart	6/2/2023	1.8	\$450.00
Friends of George's v. State of Tennessee	Receipt and review of Judgment.	Melissa Stewart	6/7/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Email to Abby Rubinfeld	Melissa Stewart	3/18/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Zoom call with Abby Rubinfeld	Melissa Stewart	3/18/2023	0.8	\$200.00
Friends of George's v. State of Tennessee	Email to Brice Timmons	Melissa Stewart	3/19/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Email to Tricia Herzfeld to set up call re: outline of legal arguments	Melissa Stewart	3/19/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Email to Tricia Herzfeld to set up call to discuss litigation	Melissa Stewart	3/20/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Email to Shelby Teeter inquiring into Morrison & Foerster's interest in joining litigation	Melissa Stewart	3/21/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Replied to follow-up inquiries from Shelby Teeter regarding Morrison & Foerster's interest in joining litigation	Melissa Stewart	3/21/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Email to Brice Timmons regarding legal research	Melissa Stewart	3/22/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Email to Abby Rubinfeld to set up call to discuss litigation	Melissa Stewart	3/23/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Sent legal theories outline to Katie Viggiani at Morrison & Foerster	Melissa Stewart	3/23/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Email to Tricia Herzfeld to set up call to discuss litigation	Melissa Stewart	3/24/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Zoom call with Tricia Herzfeld to discuss First Amendment and Equal Protection arguments	Melissa Stewart	3/24/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Sent first draft of Complaint to Brice Timmons	Melissa Stewart	3/24/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Sent new draft of complaint to B. Timmons	Melissa Stewart	3/24/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Sent new draft of complaint to B. Timmons	Melissa Stewart	3/24/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Email to Tricia Herzfeld to follow up about potentially adding equal protection claims	Melissa Stewart	3/24/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent Brice Timmons new draft of complaint	Melissa Stewart	3/26/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Email to Vanessa Rodley seeking factual information for complaint	Melissa Stewart	3/26/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent B. Timmons first draft of motion for TRO/PI	Melissa Stewart	3/27/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent B. Timmons new draft of complaint	Melissa Stewart	3/27/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Sent B. Timmons new draft of complaint	Melissa Stewart	3/27/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Watched recorded legislative history - House floor debates	Melissa Stewart	3/27/2023	2	\$500.00
Friends of George's v. State of Tennessee	Watched recorded legislative history - Senate floor debates	Melissa Stewart	3/27/2023	2	\$500.00
Friends of George's v. State of Tennessee	Email to Jacque Wilson final version of complaint to prepare for filing	Melissa Stewart	3/27/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Sent BMT edits on Motion for TRO/PI	Melissa Stewart	3/27/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Email to Jacque Wilson final version of Motion for TRO/PI to prepare for filing	Melissa Stewart	3/27/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Sent BMT draft of amended complaint	Melissa Stewart	3/28/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent BMT new draft of amended motion for TRO	Melissa Stewart	3/28/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Email to Jim Newsom explaining that we are adding defendants	Melissa Stewart	3/28/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Sent first draft of Declaration of MystieElizabeth - Watson to BMT	Melissa Stewart	3/29/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Email to Clayton Klutts to set up phone call to discuss Franklin Pride and signing a declaration	Melissa Stewart	3/29/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent final draft of declaration of Mystie-Elizabeth Watson	Melissa Stewart	3/29/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent Clayton Klutts draft of his declaration	Melissa Stewart	3/29/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Edited Mystie-Elizabeth Watson's declaration	Melissa Stewart	3/29/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Sent edited draft of declaration to M.E. Watson	Melissa Stewart	3/29/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Sent BMT draft of Amended Motion for TRO/PI	Melissa Stewart	3/29/2023	0.1	\$25.00
Friends of George's v. State of Tennessee	Sent draft of P's Reply to D's Response to P's Motion for TRO to BMT	Melissa Stewart	3/29/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent full complaint packet for FoG v. Mulroy to BMT	Melissa Stewart	3/29/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Email to Clayton Klutts to follow up on getting his declaration finalized and signed	Melissa Stewart	3/30/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent draft declaration to Vanessa Rodley for her approval	Melissa Stewart	3/30/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent signed declarations to BMT for final approval	Melissa Stewart	3/30/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Sent Vanessa Rodley edits on her declaration	Melissa Stewart	3/30/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Email to Jacque Wilson draft Notice of Declarations for filing	Melissa Stewart	3/30/2023	0.2	\$50.00
Friends of George's v. State of Tennessee	Compiled photos into PowerPoint presentation for hearing	Melissa Stewart	3/30/2023	0.7	\$175.00
Friends of George's v. State of Tennessee	Discussed safety concerns resulting from emails from extremists groups with client	Melissa Stewart	4/11/2023	0.4	\$100.00
Friends of George's v. State of Tennessee	Meeting with MoFo team to delegate pre-trial tasks	Melissa Stewart	4/27/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Wrote up description of research needs and sent to MoFo team	Melissa Stewart	5/3/2023	0.5	\$125.00
Friends of George's v. State of Tennessee	Discussed drafting appendix with R. Dolphin	Melissa Stewart	5/4/2023	0.3	\$75.00
Friends of George's v. State of Tennessee	Zoom call with CAE shortly after midnight regarding First Amended Complaint. Reviewed pleading, discussed filing without BMT approval.	Melissa Stewart	3/28/2023	1.8	\$450.00
		Hourly Rate \$250	Total	237.3	\$59,325.00